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17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 VPN.COM LLC,  
20 *Plaintiff,*

21 vs.

22 GEORGE DIKIAN;  
23 QIANG DU; and  
24 JOHN DOE

25 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

26 **DECLARATION OF**  
27 **MICHAEL GARGULIO**

28 **DECLARATION OF MICHAEL GARGULIO**

1 I, Michael Gargiulo, declare as follows:

2 1. I have personal knowledge of all matters stated herein, or I am  
3  
4 familiar with the facts and circumstances of the matters stated herein based  
5 upon records and files maintained by myself or Plaintiff VPN.COM LLC  
6 (“VPN”), or consultation with people familiar with the matters stated below. If  
7  
8 called as a witness, I could and would competently testify to these matters.

9 2. I am an ownership member of VPN. I have read the Complaint in  
10  
11 this action (Doc. 1, filed June 29, 2022) (the “Complaint”), and to the best of  
12  
13 my knowledge, the matters stated in the Complaint are true and correct.

14 3. The Defendant George Dikian (“Dikian”) is well known to me and  
15  
16 VPN, and to the domain investor community in general.

17 4. VPN and representatives had communications with Dikian dating  
18  
19 as far back as 2015, and the email addresses used by Dikian at those times were  
20  
21 G.Dikian@yahoo.com and George@37.net.

22 5. VPN and representatives have also had many communications  
23  
24 back and forth with Dikian throughout the relevant time period in the  
25  
26 Complaint, this year, through Dikian’s email addresses of  
27  
28 G.Dikian@yahoo.com and George@37.net.

6. That these email addresses belong to Dikian was also confirmed by  
VPN through internal investigation of historical Whois records tied to the

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**DECLARATION OF MICHAEL GARGULIO**

1 domain name <89.com> as well as other domains at issue in the Complaint and  
2 owned by Dikian. Indeed, George@37.net has been the Whois registrant and  
3 administrative email of record for 89.com since July, 2012.  
4

5 7. Furthermore, on May 12, 2022, I had a phone conversation with  
6 Dikian, whereon, among other things, Dikian confirmed that the email  
7 addresses G.Dikian@yahoo.com and George@37.net did indeed belong to and  
8 were used by Dikian.  
9

10 8. Upon information and belief, Dikian provided a physical address  
11 and identification card to Escrow.com, which allowed Dikian's Escrow.com  
12 account to be Verified. Due to privacy policies, however, VPN has been unable  
13 to receive this information to date from Escrow.com.  
14

15 9. VPN has been unable to locate or pinpoint Dikian's exact location  
16 within California or United States.  
17

18 10. As to the Defendant Qiang Du ("Du"), VPN's sole  
19 communications with Du were through Du's email address of  
20 rhwdomains@gmail.com.  
21

22 11. Du provided this email and his location of Hong Kong as Du's  
23 contact details when Du first contacted VPN in April, 2022.  
24

25 12. Since that time, VPN has had numerous communications with Du  
26 through Du's email address of rhwdomains@gmail.com.  
27  
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**DECLARATION OF MICHAEL GARGULIO**

1           13. Du has never provided a physical address that Du maintains, other  
2 than that Du stated Du was located in Hong Kong.  
3

4           14. VPN has been unable to locate or pinpoint Du's exact location  
5 within Hong Kong.  
6

7           I declare under penalty of perjury that the foregoing is true and correct.

8  
9 Executed this 25<sup>th</sup> day of August, 2022 in the State of Georgia, USA.

10  
11                               /s/ Michael Gargulio  
12                               Michael Gargulio  
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**DECLARATION OF MICHAEL GARGULIO**